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<b>EXHIBIT</b> <b>A</b>
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January 24, 2021

TO: Dominion Energy South Carolina (DESC)

FROM: AARP South Carolina

RE: Docket 2020-125-E/Docket 2021-570—Stakeholder Process on Energy Affordability Programs for Dominion Energy South Carolina (DESC)

AARP, on behalf of its more than 600,000 members in South Carolina many who are served by Dominion Energy South Carolina (DESC), is pleased that DESC agreed to include the creation of this stakeholder process in Paragraph 21 of the settlement of the rate case that was approved by the Public Service Commission (PSC) on August 16, 2021. We have attended the stakeholder workshops regarding the electric affordability stakeholder process and appreciate the information presented by DESC on December 14 regarding the percent-of-income payment program (PIPP) that is operated by Dominion in Ohio. We look forward to furthering our successful collaboration this year with all of the stakeholders to develop a low-income program solution that works for DESC and its customers.

We are concerned by the statement that a percent of income payment plan (PIPP), such as the Dominion Ohio program, would require legislative authorization prior to implementation. AARP's hope is that this collaborative can instead move forward with an agreement that recommends the implementation of a DESC low-income pilot program, before seeking legislation. Investor-owned utilities around the country operate successful low-income programs which emerged as a result of settlement agreements without a legislative mandate. Furthermore, many of the low-income programs that are mandated by legislation in other states began as collaborative pilot programs. Pilot programs allow the parties to evaluate what works and does not work and make changes accordingly before permanent implementation. The collaborative is not limited to examining only PIPP programs. Paragraph 21 of the rate case settlement suggests that work begin to develop a program that contain two components:

- (1) *an affordable payment program that provides a discount to eligible customers on their monthly bills, or caps their monthly bills based on income; and*
- (2) *an arrearage crediting or arrearage management program.*

It is AARP's belief that a program which would provide a discount or credit on the bills of eligible households without establishing a separate low-income rate would not require legislation to implement, especially if it is implemented by settlement on a pilot program basis.

An example of a proven low-income program that operates through agreement is the Keeping Current program of Ameren Missouri, which was developed in collaboration with AARP, and which has been continually improved through an active collaborative process with stakeholders in that state. This program provides monthly bill credits of \$60 or \$90 for electric heating customers based on income eligibility determined through LIHEAP. These bill credits are also linked to arrearage management and weatherization components. Some other recent examples of AARP advocacy regarding low-income programs in other states:

- In Vermont, AARP is advocating for a statewide roll out of the low-income rate discount currently offered only by Green Mountain Power through a pilot program, which provides for a 25% discount to eligible low-income customers.
- In New York, AARP advocated for a "one stop shop" approach in the state whereby customers are enrolled in all programs at once (low-income energy assistance rate, LIHEAP, etc.) using a file match system that identifies eligible customers and enrolls them in all of them.
- In New Jersey, AARP advocated that low-income programs for utility customers be expanded to 200% of the Federal poverty level. The Board of Public Utilities raised the eligibility from 150% to 175% in their order.

These examples just scratch the surface of the many innovative utility-specific low-income programs that are available around the country. AARP supports the timely implementation of a pilot, easy-to-administer program based on stakeholders' collaborative efforts to address the particular needs of DESC customers. AARP also recommends that six or twelve months after the program begins, stakeholders review the pilot program to identify any possible areas for improvement. As part of that effort, DESC or the PSC would commission a consultant study on best practices nationwide in the utility industry on affordability programs. The future study could evaluate:

- current Dominion, state, and Federal low-income energy assistance programs including programs Dominion offers in other states.
- discount programs for low-income customers including how eligibility is verified, if it is linked to other programs, etc.
- percent of income payment plan programs like the Dominion East program used in Ohio.
- what legislative action might be required to make permanent any pilot low-income discount programs established in South Carolina
- cost to non-participants in terms of increased rates to fund such discounts.
- best practices in who administers the programs. (It is our understanding that in Ohio, a state agency administers the PIPP program for electric customers.)
- best practices in how to determine and verify eligibility for such programs
- how to link to similar programs like LIHEAP

The consultant report could also highlight arrearage management and arrearage crediting programs used by other utilities including:

- how long are the repayment plans for customers (12 months, 24 months, etc.)?
- are write offs of some or all the utility debt allowed?
- what is the availability of Federal assistance or Federal dollars to fund the program?

In developing the type of pilot program that works best for DESC, AARP strongly recommends that it be thoroughly evaluated by a third-party evaluator, in order to determine the program's success in keeping struggling customers connected to essential energy services while paying an appropriate amount towards their monthly bills. Such evaluations can be invaluable in revising programs to meet the collaborative's goals.

In conclusion, AARP strongly supports rapid adoption, without legislation, of a pilot energy affordability program to assist DESC customers in need. The current programs (a county-administered LIHEAP benefit program, and a program consisting of voluntary contributions) are insufficient to assist those customers who are struggling to pay their bills.

AARP looks forward to working with the collaborative to develop a program that would not require legislation to implement, at least on a pilot program basis, and in so doing, provide timely assistance to DESC customers.

AARP appreciates this opportunity to comment and is eager to see a low-income energy affordability program rolled out soon in the Dominion Energy South Carolina service territory.

Sincerely yours,

*Alice Bennett*

Acting Director – AARP South Carolina